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November 26, 2024

Via ECF

Hon. Philip M. Halpern, U.S.D.J
United States District Court, S.D.N.Y
300 Quarropas Street, Room 530
White Plains, New York 100601

**Re: *Netgear, Inc. v. Olive Branch Enterprises Inc.*, No. 7:24-cv-5183-PMH – Letter
Motion for Extension of Deadline to Respond to Defendant/Counterclaim Plaintiff's
Counterclaims**

Dear Judge Halpern:

We represent the Plaintiff NETGEAR, Inc. (“NETGEAR”) in the above-captioned matter and write pursuant to Rule 1(c) of Your Honor’s Individual Practices in Civil Cases to Request an Extension of NETGEAR’s time to respond to the Answer and Affirmative Defenses to Complaint and Counterclaims (the “Counterclaims”) filed by Defendant Olive Branch Enterprises, Inc. (“Defendant” or “Olive Branch”).

On November 11, 2024, Olive Branch filed its Counterclaims. *See* ECF No. 28. NETGEAR’s time to respond to the Answer and Affirmative Defenses to Complaint and Counterclaims (the “Counterclaims”) is currently December 2, 2024.

NETGEAR respectfully requests a two-week extension of its time to respond to the Counterclaims. The new deadline for NETGEAR to respond to the Counterclaims would be December 16, 2024. NETGEAR makes this request because the parties have been engaged in

meaningful settlement negotiations and wish to continue pursuing those discussions. Defendant Olive Branch has consented to this request for an extension. This is the first time NETGEAR has requested an extension of the time to respond to the Counterclaims.

Respectfully submitted,

/s/Thomas A. Warns
Thomas A. Warns

CC: All counsel of record via ECF